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REMARKS

Claims 1-27 are currently pending in the subject application and are presently under consideration. A clean version of all pending claims is found at pages 2-6 of this Reply for ease of reference for the Examiner – no amendments have been made herein. Favorable reconsideration of the subject patent application is respectfully requested in view of the comments herein.

I. Rejection of Claims 1-27 under 35 U.S.C. §102(e)

Claims 1-27 stand rejected under 35 U.S.C. §102(e) as being anticipated by Tjandrasuwita (U.S. Patent No. 6,198,469). It is respectfully submitted that this rejection should be withdrawn for at least the following reasons.

Tjandrasuwita does not disclose each and every element as set forth in the subject claims. Specifically, Tjandrasuwita does not disclose a grayscale generator programmable *to generate grayscale formatted data according to a selected display mode* for one of a plurality of disparate display types and formats as recited by independent claims 1 and 22. On the contrary, Tjandrasuwita merely teaches grayscale logic 301 for an STN module- ***NOT*** for a TFT module 207. Applicants' representative respectfully asserts that the Examiner improperly states the STN module 207 and the TFT module 206 apply grayscale logic 301. Tjandrasuwita does not allow flexible application of gray scaling to multiple disparate display types in a single video controller. No where in Tjandrasuwita discloses a programmable gray scale generator to generate grayscale *formatted data according to a selected display mode*. Thus, Tjandrasuwita cannot format data according to the selected display mode since the only mode grayscale is provided is STN.

Tjandrasuwita states that the two data paths of TFT module 206 and STN module 207 "receive data from a single source and operate (*e.g.*, process and propagate data) *mutually exclusively of each other*." (See Col. 5, lines 20-23 and Col. 6, lines 13-14). In addition, the STN module 207 is depicted in more detail in Fig. 3- which includes a gray scaling logic 301. By emphasizing the exclusivity and separate internal data paths, Tjandrasuwita clearly discloses a gray scaling logic **ONLY** within the STN module 207. Thus, the applicants' representative respectfully requests the rejection to be withdrawn.

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Furthermore, Tjandrasuwita "formats the data to suit the type of display." (See Col. 4, lines 59-61 and Col. 5, line 3). Thus, the flat panel interface 113 formats the data to suit the type of display such as a television (TV) monitor. (See Col. 4, lines 60-61). However, the present invention generates grayscale formatted data *according to a selected display mode* for one *of a plurality of disparate display types and formats*. The formatting of the data, as recited in the subject invention (e.g., according to the selected display mode), is not done to suit *the type of display* as disclosed by Tjandrasuwita. Accordingly, independent claims 1 and 22 (of which claims 2-14, and 23-27 depend therefrom) are believed to be allowable. Therefore, withdrawal of the rejections is respectfully requested.

In the Final Office Action dated March 14, 2003, the Examiner states Tjandrasuwita "...teaches data can be formatted for either TFT mode or STN mode, the reference therefore meets *the claimed limitation of selecting a display mode for ONE of a plurality of disparate display types and formats* in the amended claim 1 and similar claims." Assuming arguendo Tjandrasuwita provides grayscale logic for TFT mode or STN mode, the Examiner incorrectly interprets the terms display mode and display type. The Examiner argues Tjandrasuwita provides STN mode and TFT mode and the limitation of "ONE of a plurality of disparate display types and formats" is met. Applicants' representative respectfully disagrees. STN mode and TFT modes are not "one of a plurality of disparate display types and formats" as defined by the present invention. Thus, the rejection is respectfully requested to be withdrawn.

In addition, Applicants' representative assumes that the Examiner believes that said element is inherent from the fact that the two are modules are drawn in parallel and are mutually exclusive because the gray scale logic is not expressly described with respect to the TFT module 206. However, such a statement is pure speculation on the part of the Examiner, since Tjandrasuwita is specifically directed toward producing gray scale shading only for STN displays (See Title, col. 1, lines 9-13, col. 2, lines 26-35, and col. 4, lines 5-18). While Tjandrasuwita does disclose that data can be formatted for either TFT mode or STN mode, the reference does not disclose, teach, or suggest either expressly or inherently employing grayscale logic 301 with respect to both TFT and STN modes. The mere fact that such functionality may be possible is not sufficient to establish the anticipation of independent

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claims 1, 15, and 22 under § 102. Additionally, a person of ordinary skill in the art would not be motivated, without consulting the applicants' specification, to modify Tjandrasuwita to produce the subject invention as claimed at least in part because Tjandrasuwita fails to teach or suggest the desirability of producing a single raster engine capable of providing grayscale data to one of a plurality of disparate display types, formats, or *modes* (e.g., CRT, LCD, TFT, STN). Accordingly, the rejection of claims 1 and 22 (as well as claims 2-14 and 23-27 depending, respectively, thereon) should be withdrawn for at least this reason.

Furthermore, Tjandrasuwita does not disclose a raster engine providing selected pixel data at a parallel output according to a *selected display mode*, as recited by independent claims 1 and 22. The subject invention discloses a raster engine that is programmable to generate grayscale logic formatted data according to a user selected display mode for one of a plurality of display types. (See page 9, lines 3-5, and Fig. 31). Accordingly, the engine can support analog CRTs, analog LCDs, as well as digital LCDs. Conventional raster engines and video controllers require manual rerouting of signal connections to interface different display formats, whereas the present invention provides for universal connectivity (See page 9, lines 23-26). As shown in figure 1, Tjandrasuwita provides separate outputs from the computer system for a CRT and an LCD wherein the LCD output is routed through a separate flat-panel interface. Therefore, Tjandrasuwita does not anticipate claims 1 and 22 because selected pixel data at a parallel output according to a selected display mode is not disclosed as recited by the subject invention's claims. In other words, the raster engine utilizes a single output for the numerous display modes. Accordingly, claims 1 and 22 (as well as claims 2-14 and 23-27 depending, respectively, therefrom) are allowable and withdrawal of their rejection is respectfully requested.

Finally, as per claim 15, Tjandrasuwita fails to disclose teach or suggest a *grayscale lookup table control register* programmable by a computer system. Tjandrasuwita merely teaches a control register to a select signal for selecting either a color or monochrome display (See Col. 5, lines 59-61 and Col. 6, lines 17-18). Independent claim 15 provides a *grayscale look up table control register and a gray scale look up table*. Examiner states Tjandrasuwita discloses both elements, yet the reference does not teach, disclose or suggest a *gray scale look up table control register*. Accordingly, independent claim 15 is allowable, because Tjandrasuwita fails to disclose, teach, or suggest each and every element of the claim.

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Claims 16-21 depend from allowable claim 15. Therefore, the rejection of claims 15-21 should be withdrawn for at least this reason.

In view of the aforementioned, claims 1, 15, and 22 (as well as claims 2-14, 16-21, and 23-27 depending, respectively, therefrom) are allowable and their allowance is respectfully requested.

CONCLUSION

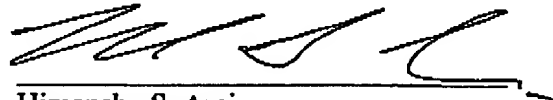
The present application is believed to be condition for allowance in view of the above comments and amendments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063.

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicants' undersigned representative at the telephone number listed below.

Respectfully submitted,

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